



STATE OF OKLAHOMA

))))))))))

30

)

1

1

CJ

2015-589 1

PETITION

Plaintiffs state:

- 1

f. Defendant failed to use her brakes, horn or steering mechanism to avoid the collision.

g. Defendant failed to maintain proper control over her vehicle at a time when Defendant knew or should have known that without such control persons, including Johnny, Shelby and Jacob, were likely to be injured.

4. As a result of Defendant's negligence, Plaintiffs suffered personal injuries that are permanent, painful and progressive.

5. At the time of the subject collision, Johnny was 52 years old with a life expectancy of 27.84 years. Johnny has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.

6. At the time of the subject collision, Shelby was 36 years old with a life expectancy of 46.15 years. Shelby has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.

7. At the time of the subject collision, Jacob was 24 years old with a life expectancy of 53.35 years. Jacob has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs pray judgment against Defendants in an amount in excess of \$75,000.00, together with attorney fees, interests and costs of this action.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Dacia Abel", written over a horizontal line.

DACIA ABEL, OBA #30968

ABEL LAW FIRM
900 N.E. 63rd Street
Oklahoma City, OK 73105
(405) 239-7046
(405) 418-0833 (fax)
dabel@abellawfirm.com
ATTORNEY FOR PLAINTIFFS

ATTORNEYS' LIEN CLAIMED